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19 *Attorneys for Defendant NETFLIX, INC.*

20
UNITED STATES DISTRICT COURT
21
NORTHERN DISTRICT OF CALIFORNIA

23 LAURI VALJAKKA,
24 Plaintiff,
25 v.
26 NETFLIX, INC.,
27 Defendant.

28 Case No. 4:22-cv-01490-JST

DECLARATION OF JASSIEM N.
MOORE IN SUPPORT OF JOINT
STIPULATION FOR EXTENSION OF
TIME FOR EXPERT REPORTS

Judge: Hon. JON S. TIGAR

Declaration of Jassiem N. Moore

I, Jassiem N. Moore, hereby declare:

3 1. I am an attorney with the law firm Perkins Coie LLP, based in Seattle,
4 Washington, and represent Defendant Netflix, Inc. I have personal knowledge of the facts set
5 forth in this declaration and am competent to testify.

6 2. I am submitting this declaration in support of the Parties' Joint Stipulation and
7 [Proposed] Order to Extend Time for Expert Reports pursuant to Northern District of California
8 Civil Local Rule 6-2.

9 3. There have been five previous time modifications in this case.

10 5. Netflix filed an unopposed administrative motion to extend the time to hold the
11 Initial Case Management Conference from April 19, 2022 to May 3, 2022. (Dkt. 29, as granted
12 Dkt. 32).

13 6. On May 18, 2022, the parties jointly submitted a proposed order for a two-week
14 extension for Netflix to respond to the Second Amended Complaint. The Court granted the
15 proposed order on May 20, 2022. (Dkt. 46, as granted Dkt. 47).

16 7. On September 2, 2022, the parties jointly stipulated to extend the time for Netflix
17 to respond to Valjakka’s damages contentions. The Court granted the proposed order on May 20,
18 2022. (Dkt. 59).

19 8. On April 4, 2023, the parties jointly submitted a proposed order to extend time for
20 mediation. The Court granted the proposed order on April 5, 2023. (Dkt. 94, as granted Dkt. 95).

21 9. On May 11, 2023, Valjakka submitted an unopposed motion to amend the case
22 schedule. On May 18, 2023, the Court granted Valjakka's motion. (Dkt. 96, as granted Dkt. 98).

23 10. On June 16, 2023, the parties met and conferred regarding the schedule for expert
24 report briefing. Valjakka requested, and Netflix agreed to, a 7-day extension of the opening expert
25 report deadline for both parties and a 7-day extension of the rebuttal expert report deadline for
26 Netflix. The requested time modification would extend the dates for expert reports as shown in
27 the table below and does not modify any other deadlines in the Court's Scheduling Order.

1	Date	7 days	Description
2	06/30/2023	07/07/23	Opening expert reports due
3		08/11/23	Valjakka Rebuttal expert reports due
4	08/11/2023	08/18/23	Netflix Rebuttal expert reports due

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed on June 28, 2022, in Seattle, Washington.

/s/ Jassiem N. Moore
Jassiem N. Moore